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May 1, 2007

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: *Washington RSA No. 8 Limited Partnership Quarterly E911 Status Report*  
*CC Docket No. 94-102*

Dear Ms Dortch:

Pursuant to the Commission's *Order* in the above reference proceeding,<sup>1</sup> Washington RSA No. 8 Limited Partnership ("WA8LP") hereby submits its E911 status report ("Report"). This Report provides the Commission with the current status of WA8LP's progress towards compliance with the 95% handset penetration requirement set forth in Section 20.18(g)(1)(v) of the Commission's Rules.<sup>2</sup>

Please contact the undersigned if you should have any questions regarding this Report.

Sincerely yours,



William J. Sill

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<sup>1</sup> See *In the Matter of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order*, FCC 06-25 (rel. Mar. 8, 2006); see also Request for Limited Waiver of Washington RSA No. 8 Limited Partnership, CC Docket No. 94-102 (filed Dec. 5, 2005).

<sup>2</sup> See 47 C.F.R. § 20.18(g)(1)(v).

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of )  
 )  
Revision of the Commission's Rules to Ensure ) CC Docket No. 94-102  
Compatibility with Enhanced 911 Emergency )  
Calling Systems )  
 )

To: The Commission

**WASHINGTON RSA NO. 8 LIMITED PARTNERSHIP'S QUARTERLY HANDSET  
PENETRATION STATUS REPORT**

Washington RSA No. 8 Limited Partnership ("WASLP"), by its attorneys, and pursuant to the Commission's March 8, 2006 *Order* in the above-captioned proceeding,<sup>1</sup> was granted a limited waiver of the 95% handset penetration rate for its subscribers until October 31, 2006 and was required to file quarterly reports ("Quarterly Report") during the extension period.<sup>2</sup> WA8LP hereby submits its status report regarding its compliance with the 95% handset penetration requirement set forth in Section 20.18(g)(1)(v) of the Commission's Rules.<sup>3</sup>

To be responsive to its subscribers' needs, WA8LP offers its subscribers the flexibility to subscribe to either its pre-paid program or post-paid program. Under the former, a subscriber purchases a specified dollar amount of service prior to utilizing the service and in the latter, a subscriber is billed on a monthly basis after service has been rendered. This Quarterly Report includes data and information from both programs.

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<sup>1</sup> See *In the Matter of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order*, FCC 06-25 (rel. Mar. 8, 2006) ("Order"); see also Request for Limited Waiver of Washington RSA No. 8 Limited Partnership, CC Docket No. 94-102 (filed Dec. 5, 2005).

<sup>2</sup> See *Order*, FCC 06-25 at ¶¶ 15-17. The WA8LP requested a one year extension, through October 31, 2007. See Request of Washington RSA No. 8 Limited Partnership for Limited Waiver, CC Docket No. 94-102 (filed Oct. 31, 2006). On February 8, 2007, the FCC granted a partial extension, until August 8, 2007. See *Revision of the Commission's Rules to Ensure Compatibility with ENHANCE 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order*, FCC 07-9 at ¶15 (rel. Feb. 8, 2007). On March 12, 2007 WA8LP filed a Petition for Reconsideration requesting the extension period be extended to October 31, 2007.

<sup>3</sup> See 47 C.F.R. § 20.18(g)(1)(v).

## **I. Number and Status of Phase II Requests From PSAPs**

WASLP provides cellular service on the B Block frequencies in the Washington 8 – Whitman, Idaho; in the Idaho 1(B)(2) RSA – Boundary RSA submarket, and in the Idaho 2 (B)(2) RSA submarket (Call Signs KNKN489, KNKQ400, and KNKR305). To date, WASLP has received 5 valid requests for Phase II E911 service within the state of Washington. All 5 of these requests have been fulfilled and Phase II service is being provided. Similarly, WASLP has received 2 Phase II requests from Idaho PSAPs in its service area, both of which have been completed.

## **II. Dates On Which Phase II Service Has Been Implemented/Estimated Dates On Which Phase II Service Will Be Available to PSAPs Served by Its Network**

Phase II service has been implemented for the following PSAPs:

<u>PSAP Name</u>	<u>Implementation Date</u>
Asotin County, Washington	May 2005
Columbia County, Washington	May 2005
Garfield County, Washington	May 2005
Walla Walla County, Washington	May 2005
Whitman County, Washington	May 2005
City of Moscow, Idaho	June 2005
Nez Perce County, Idaho	June 2006

## **III. Status of Coordination Efforts with PSAPs for Alternative 95% Handset Penetration Rates**

WASLP continues to remain in regular contact with the appropriate public safety officials in its service area regarding the implementation of Phase I and Phase II E911 and updates of WA8LP's ALI-capable handset efforts. WA8LP believes the relevant PSAPs in WA8LP's service area are aware of WA8LP's handset deployment plan. Furthermore, no PSAP has expressed objection to WA8LP's handset deployment plan.

## **IV. Efforts To Encourage Customers To Upgrade To Location-Capable Handsets**

As reported in its May 2006 E911 Status Report, WA8LP has designed multi-faceted campaign which provides a clear path to full compliance. With the goal of achieving the 95% handset penetration rate by August 8, 2007, WA8LP has completed the following multi-tiered campaign to encourage customers to upgrade to an ALI-compliant handset:

- 1) **Free ALI-capable Handsets:** Starting in November 2003, WASLP had provided ALI-capable handsets at no charge to new post-paid customers that selected a two year contract. WA8LP estimated that this offering saved customers an average of

\$120. More recently, on February 9, 2007, WA8LP began offering to all of its existing customers (both pre-paid and post-paid) who did not have an ALI-capable phone the option of receiving a free ALI-capable handset or a \$50 discount on the ALI-capable handset of their choice. Additionally, those post-paid customers participating in this offer will also receive 500 bonus minutes, while pre-paid customers receive a \$15 service credit.

- 2) **Discounted ALI-capable Handsets:** For existing post-paid customers, WA8LP offers a \$120 ALI-capable handset discount to customers who choose to renew their service for two years. In addition, as described above, WA8LP now offers to those existing customers who do not have an ALI-capable handset an additional \$50 discount when they switch to an ALI-capable handset.
- 3) **Bill Inserts:** In August and September 2006, WA8LP attached bill inserts into its post-paid subscribers bills reminding them of the discounts WA8LP offers on ALI-capable handsets. Due to lack of any positive customer response, the bill insert program has been temporarily discontinued.
- 4) **WA8LP Analyzes Results of Program and Contacts Every Subscriber with an Analog Handset:** WASLP continually analyzes the results of steps 1-4 and has, as a result, implemented and completed a direct mail flyer program and a direct phone call campaign that has, on multiple occasions, reached *all* of WA8LP's customers who have not yet traded in their analog phones, which has proven to be very effective. WA8LP's direct mailings were sent out at in May 2006, August 2006, March 2007, and April 2007, with additional direct mailings are planned for June 2007, July 2007, and August 2007. In addition, in May 2006, WA8LP's direct phone call campaign contacted each subscriber with a non-ALI capable handset urging the subscribers to trade-in their analog handsets and answered any questions they had about the benefits of Phase II service. In August 2006, WA8LP began a second round of direct calls. Due to customer dissatisfaction to receiving multiple calls regarding ALI handsets, WA8LP temporarily discontinued this program in March 2007. WASLP plans to call all of its customers again in June 2007.
- 5) **Point-of-Purchase Displays:** WA8LP produced and utilizes in-store, point-of-purchase flyers to ensure that its current and prospective subscribers are notified of their ability to trade-in their analog handset for a free digital phone.
- 6) **Website ALI Information:** Information regarding customer options to upgrade to ALI-capable phones is also available on WA8LP's website.
- 7) **Introduction of a Digital Bag Phone:** Many of WA8LP's analog handset subscribers utilize analog bag phones to obtain service in rural areas with marginal service. In September 2006, WA8LP introduced a digital bag-phone manufactured by Motorola which will have a greater range than the conventional digital handset. The digital bag phone has been a disappointment, both in terms of its range and consumer interest. While its range is somewhat better than a digital handheld phone, the digital bag phone does not provide nearly the equivalent coverage of an analog bag phone. WA8LP expects that these limitations have contributed to the fact that the company has still sold less than twenty digital bag phones to date. Due to lack of

customer demand, digital bag phones will become a special order item. As an alternative, WASLP will continue to market and install external antennas and signal boosters that can be attached to its ALI-capable digital handsets to enhance their range.

- 8) **Significant Build-out of Digital Base Stations:** As reported in its May and August 2006 E911 Status Reports, WASLP has embarked on a significant build out campaign to construct additional facilities that will enhance the quality of its digital coverage and thus diminish any subscriber perception that currently, analog coverage exceeds digital coverage. In 2006, WASLP had constructed and made operative 12 new digital sites even though it was faced with significant delays caused by weather and other circumstances beyond WA8LP's control. Since filing its February Status Report, three additional digital facilities have been completed and gone online. Four additional digital facilities are currently under construction.

## **V. Percentage of Customers with Location Capable Phones**

As of the date of the instant filing, 91.2% of WA8LP's customers have upgraded to ALI-capable handsets, up 4.1% from WA8LP's February 2007 E911 Status Report. While WA8LP still has a long way to go to reach the 95% penetration rate, WASLP is steadfast in its desire to accomplish this goal in a timely manner and as described above, will be re-doubling its efforts in the coming months. As discussed in detail in Section IV *supra*, WASLP has already devoted significant efforts and resources to increasing its ALI penetration rate and WA8LP will continue to explore new approaches to convince its analog holdouts that the time has come to transition to digital ALI handsets.

## **VI. Detailed Information on the Status in Achieving Compliance**

In the course of contacting its subscribers by telephone and speaking with them in WA8LP's retail stores, WASLP has found that many customers are exhibiting a profound reluctance to give up their current analog handsets and bag phones. The reasons for their reluctance to trade-in their phones include: 1) analog subscribers' perception that they need to retain their analog phones in order to receive service in remote areas; 2) subscribers do not believe they need ALI capabilities; and 3) general reluctance to change. WASLP is surprised by the attachment that some of its subscribers have to their analog handsets. WASLP believes that a part of this resistance is due to the fact that Phase II service is not available to subscribers in Idaho except for around Moscow, Idaho and Nez Perce County, Idaho.<sup>4</sup> Thus, analog subscribers see no "value added" to acquiring an ALI-capable handset and in fact are concerned that they will be giving up reliable coverage in fringe areas. Most disconcerting is the fact that more than a few subscribers have contacted WA8LP and stated they have received calls, bill

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<sup>4</sup> In contrast, the Eastern **Sub-RSA** Limited Partnership (which is also managed by Inland Cellular) has Phase II service throughout its market, and was able to reach the 95% benchmark.

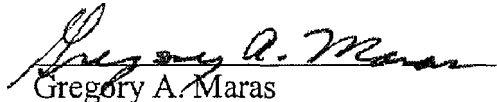
inserts and seen promotional material offering ALI handsets, but they simply are not interested in obtaining an ALI-capable handset. Although WASLP will re-double its outreach efforts to convince these subscribers to switch to an ALI-capable handset, WASLP anticipates a steep uphill battle in achieving the **95%** penetration rate by the Commission's deadline.

## DECLARATION OF GREGORY A. MARAS

I, Gregory A. Maras, do hereby declare under penalty of perjury the following is true and correct:

1. I am the Secretary of Inland Cellular Telephone Company, General Partner of Washington RSA No. 8 Limited Partnership.
2. I have reviewed the foregoing Quarterly Handset Penetration Status Report and believe it to be true and correct to the best of my knowledge, information and belief.

This declaration is executed on this 30<sup>TH</sup> day of **April**, 2007.



Gregory A. Maras  
Secretary of General Partner  
Inland Cellular Telephone Company